

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-0450-JRG
	§	
vs.	§	LEAD CASE
	§	
CITIBANK, NA	§	
	§	
Defendant.	§	
	§	
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SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-0599-JRG
	§	
vs.	§	CONSOLIDATED CASE
	§	
KWIKSET CORPORATION	§	
	§	
Defendant.	§	
	§	
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**UNOPPOSED MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT**

Plaintiff Symbology Innovations, LLC (“Symbology”) hereby notifies the Court it and Defendants Kwikset Corporation have reached an agreement in principle that will resolve all pending claims between them and request additional time to complete the settlement. Accordingly, Symbology files this unopposed motion for a stay of all pending deadlines, until and including February 27, 2017 so that the parties may finalize their agreement and submit dismissal papers accordingly. This stay is not sought for the purpose of delay but so that justice may be served.

Dated: January 27, 2017

Respectfully submitted,

/s/ Jay Johnson

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on January 27, 2017, he met and conferred with counsel for Defendant concerning this motion and that Defendant's counsel agreed to the motion.

/s/ Jay Johnson

Jay Johnson

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of this document has been served on all counsel of record via electronic mail through Local Rule CV-5(a) on January 27, 2017.

/s/ Jay Johnson

Jay Johnson